National Pork Producers Council®

The Global Voice for the U.S. Pork Industry

October 29, 2026

Office of the United States Trade Representative
1724 F Street NW
Washington, D.C. 20508

Request for Comments on Significant Foreign Trade Barriers for the 2027 National Trade Estimate (NTE) Report (Document No. USTR-2026-0498)

Dear Office of the United States Trade Representative (USTR) Trade Policy Staff Committee,

The National Pork Producers Council (NPPC) welcomes the opportunity to provide comments on the USTR annual 2027 National Trade Estimate (NTE) report, in response to the Federal Register Notice (Document No. USTR-2026-0498) requesting comments regarding significant foreign trade barriers to U.S. exports for 2026 reporting.

NPPC represents 42 state producer organizations and the domestic and global interests of more than 60,000 U.S. pork producers. The U.S. pork industry is a major value-added enterprise in the U.S. agricultural economy and a significant contributor to the overall U.S. economy, producing high-quality, safe, and affordable pork. More than 500,000 American jobs are supported by U.S. pork production, and pork exports sustain more than 155,000 of these jobs. The U.S. pork industry ships product to more than 100 countries. Exports contribute significantly to the bottom line of all U.S. pork producers, accounting for more than $66 in value for each hog marketed in 2025. Additionally, last year, the U.S. pork industry exported 3 million metric tons of pork and pork products valued at over $8.4 billion.

U.S. pork exports face various tariff and non-tariff barriers in markets around the world. As a low-cost, high-quality provider of protein, significant growth in pork exports can be achieved by removing barriers to trade. NPPC recognizes that USTR is currently negotiating trade deals and agreements and is pleased to see recent progress codified in reciprocal trade agreements (ARTs) with Malaysia, Cambodia, El Salvador, Guatemala, Argentina, Bangladesh, Taiwan, Indonesia, Ecuador, and Jordan. We note that bilateral frameworks are in progress with several other key markets including Japan, Korea, Switzerland, Liechtenstein, Thailand, Vietnam, the United Kingdom and the European Union, and more tentatively with India and the Philippines. A trade truce has also been called with China, and we appreciate the recently announced “30 for 30” tariff reductions and the establishment of the China Board of Trade. We do note with dismay, however, that none of the ARTs have been implemented, although in some cases tariff reductions have been realized. Tariff reductions and tariff-rate quota (TRQ) commitments in the EU and the UK have been implemented, although little progress has been made on reducing long-standing non-tariff barriers of concern for U.S. pork producers. We look forward to the realization of commitments in these agreements.

Many issues highlighted in our NTE comments are part of ongoing negotiations and may be resolved before the annual report is finalized. Nonetheless, NPPC believes the countries highlighted in our comments warrant mention until full market access is realized especially given the significant potential for U.S. pork exports if the current, unfair barriers listed below are resolved.

Angola

U.S. pork exports to Angola face severe, non-transparent restrictions. Angola utilizes a non-automatic import licensing scheme where permits are routinely withheld or delayed to protect local agricultural producers. Importers are often required to prove that they attempted to source pork from local producers before an import license is issued. This "local content" mandate acts as a direct barrier to trade, violating basic international trade obligations. NPPC requests that USTR require Angola to eliminate its import licensing restrictions for pork.

Australia

In 2025, the U.S. exported $281 million (75,715 MT), down 14% in value due to ongoing market restrictions. U.S. exports appear to be even further on the decline in the first half of 2026, decreasing another 26% year-over-year. Market access remains limited because of sanitary and phytosanitary (SPS) barriers related to Porcine Reproductive Respiratory Syndrome (PRRS). Australia prohibits imports of fresh pork and bone-in products from the United States, even though the United States has provided evidence documenting the safety of U.S. pork products. While Australia lifted its 22-year ban on U.S. beef in July 2025, fresh pork remains shut out. NPPC has not identified a scientific or legal justification for these barriers and continues to push for unrestricted full market access in Australia.

Brazil

NPPC supports opening the Brazilian market to allow fresh, frozen, and processed U.S. pork to be shipped to Latin America's largest economy. NPPC was disappointed that while a Section 301 investigation resulted in a 25% additional tariff on most Brazilian goods, pork was excluded despite the country's unfair barriers to imports of U.S. pork. Brazil has a *de facto* ban on U.S. pork imports that lacks any scientific justification and must be eliminated. Despite a 2019 joint statement agreeing to establish a science-based process for allowing pork imports, Brazil has still not opened its market to U.S. pork by refusing to negotiate an export certificate and eliminating the need for U.S. pork to be frozen or tested for trichinae. Meanwhile, Brazilian pork exports to the U.S. were a modest $72.2 million in 2025. Consistent with the World Organization for Animal Health (WOAH), U.S. biosecurity programs have already reduced trichinae risk to negligible levels, making Brazil's requirements more trade restrictive than necessary and inconsistent with international standards. We urge USTR to consider exercising import tariffs against Brazilian pork, should Brazil fail to address its underlying trade restrictive requirements for U.S. pork.

Cameroon

On January 27, 2026, Cameroon's Ministry of Livestock, Fisheries and Animal Industries (MINEPIA) announced a complete import ban on pork and poultry under an aggressive import-substitution policy to promote domestic industry. While Cameroon claims in WTO notifications that it no longer operates an import licensing regime, MINEPIA requires mandatory prior authorizations for all HS Chapter 02 pork imports. This ban appears to violate GATT principles and has never been notified to the WTO. NPPC urges USTR to continue to challenge Cameroon's import substitution ban at the WTO Committee on Agriculture.

China

Although China has been an important market for U.S. pork in recent years, there are many restrictions on U.S. pork exports that remain in place and inconsistent with international standards. China's onerous facility registration system continues to contribute to unstable market conditions, restricting U.S. export potential. In March 2025, more than 300 pork processing and cold storage facilities had their registrations renewed for another five years. Leading up this, two U.S. pork facilities had their General Administration of Customs of the People's Republic of China (GACC) registration lapse in early 2025 and hundreds more were facing expiration. Since pork is labelled as high-risk, registration is required every 5 years. Addressing this issue is important to providing long term stability for U.S. pork exports to China, but also stemming the tide of copy-cat requirements pursued by other countries.

China also bans the use of beta agonists, such as ractopamine, instead of following internationally accepted Codex Alimentarius (Codex) Maximum Residue Levels (MRLs). The Phase One Agreement between the U.S. and China required China to conduct a risk assessment for ractopamine in pork, but after more than five years, the ban remains in place, and no risk assessment has been performed. China remains an important global market for U.S. pork importing $857 million (367,416 MT) in 2025 and taking 59% of all U.S. pork offal exports. U.S. 2026 exports appear to be on track, declining by about 2% over trade in the first half of 2025. NPPC urges USTR to press China to conduct a risk assessment for ractopamine in pork and establish a residue level as agreed under the Phase One agreement.

While a trade truce has also been called with China and "30 for 30" tariff reductions have been announced that would positively impact a broad range of swine, pork and pork products, the lack of details on the timing and tariff level reduction levels to be implemented more than a month after announcements is concerning. Delaying implementation of these tariff reductions hamstrings U.S. pork producers who rely heavily on global exports, including the China market. NPPC is pleased with the establishment of the China Board of Trade, and mention of an Agriculture Working Group under the Board of Trade. NPPC is eager to see this body operationalized to facilitate progress on long-standing tariff and non-tariff issues of concern to U.S. agriculture and American pork producers in particular.

Cote d'Ivoire

Cote d'Ivoire presents solid growth potential for U.S. pork in West Africa, but trade continues to be stifled by a lack of transparent import regulations. Importers face severe signature delays when securing Autorisation Préalable d'Importation (API) permits from the Ministry of Animal and Fishery Resources. Furthermore, the Direction des Services Vétérinaires (DSV) mandates origin laboratory testing and physical border inspections for African swine fever (ASF) and classical swine fever (CSF). Demurrage and storage costs accrued during inspection delays frequently wipe out commercial profit margins. NPPC encourages USTR to continue to advocate for transparent, unrestricted market access for U.S. pork exports to Cote d'Ivoire.

Ecuador

U.S. pork faces onerous import licensing schemes that block access in Ecuador. In 2020, the U.S.-Ecuador Trade and Investment Council Agreement (TIC) identified simplification of this process as a goal of the agreement. The opposite has occurred. Since the TIC was negotiated, import permits have been painfully slow to materialize or denied without justification. Furthermore, Ecuador requires domestic

purchases prior to assigning import licenses and limits total imports to a predetermined amount, in likely violation of its WTO commitments. Ecuador has also established additional export registration requirements known as “Annex 2.” This ambiguous process is further impeding U.S. pork’s ability to successfully export to Ecuador. There is additional concern with AGROCALIDAD Resolution 115-2019 and Resolution 003-2016, which require registration of processing facilities for veterinary inputs and for livestock products and byproducts – an expansive and unnecessary scope – to receive import permit authorization. NPPC supports Ecuador’s ART agreement which contains commitments to address these concerns once implemented. U.S. exports of pork to Ecuador grew to $1.7 million in 2025 and could be expanded further once the ART is fully implemented.

European Union

In the European Union (EU), U.S pork must compete with suppliers that have preferential access under free trade agreements the EU has concluded with 20-plus other nations, putting U.S. producers at a significant disadvantage. U.S. pork access is also disadvantaged because the EU does not recognize the equivalence of U.S. pork production practices, nor does the EU accept exports from all USDA-approved facilities. The EU restricts pork through several non-science-based measures, including restrictions on hormones and beta agonists such as ractopamine. Recent introduction of onerous and unnecessary testing requirements for stilbenes and antithyroid use for imports add additional bureaucracy that hinders U.S. pork market access. These restrictions are not based on Codex standards or scientific risk analysis.

NPPC also remains concerned with the EU’s intention to implement policies around “sustainable” agricultural production, including the proposed deforestation-free supply chain regulation and "mirror clauses" for the extraterritorial application of EU animal welfare regulations, especially given the bloc’s history of disregarding legitimate concerns and input from trading partners. The United States-European Union Turnberry Agreement includes a commitment for the U.S. and EU to work together to simplify sanitary certificate requirements for pork and dairy products. Addressing these non-tariff barriers will help reduce complexity and cost for U.S. exporters.

Simultaneously, as the EU and the United Kingdom (UK) work towards an SPS agreement, NPPC remains concerned about the lack of potential market access opportunities with the UK. Through this SPS agreement, the UK is planning to align with current EU measures and regulations, which will ultimately cause non-tariff barrier issues for U.S. pork.

U.S. exports pork to the EU were $5.6 million in 2025, while the U.S. imported over $724 million from the EU in the same period.

Honduras

The Honduran president has publicly discussed renegotiating the agriculture provisions of the Dominican Republic-Central America Free Trade Agreement (DR-CAFTA). Furthermore, the government has previously required local purchases prior to importing pork from the United States. NPPC notes that DR-CAFTA’s pork import provisions were phased in over 20 years. Renegotiating DR-CAFTA to restrict U.S. imports would undermine an important trade relationship and food security in Honduras. Honduran consumers benefited from $173 million worth of high-quality U.S. pork imports in 2025, an increase of 18%. However, problems remain, including a discriminatory 15 percent tax applied on certain pork cuts imported with customs documentation in English, while the same cut is exempt domestically.

India

In early 2022, India granted access for U.S. pork and pork products. However, in September 2022, India proposed an additional export certificate with additional attestations that are not relevant to food safety or based on science, nor were they negotiated with U.S. regulatory authorities. Pork exports have been virtually zero since 2022 when access was "granted" and then effectively revoked with the new certificate attestations. Additionally, in February 2023, the Food Safety and Standards Authority of India (FSSAI) introduced new facility registration requirements that are unnecessarily burdensome. NPPC welcomed news in February 2026 of a Framework agreement with India that included commitments for tariffs reductions on agricultural products and an agreement to address long-standing non-tariff barriers on U.S food and agricultural exports. However, given that this agreement and these commitments have yet to be finalized, NPPC implores USTR to continue working with the Indian government to resolve the export certification issues and address the burden of facility registration in order to facilitate U.S. pork exports to India.

Indonesia

U.S. pork exports to Indonesia totaled a mere $1.6 million of mostly frozen pork in 2025, a decrease of 78%. The country has a facility registration approval process that lacks transparency and predictability, and is overly cumbersome, which discourages U.S. pork plants from registering. In addition, Indonesia requires payment to conduct audits, a highly unusual demand. Implementing key commitments from the United States-Indonesia ART is key to securing better access to the Indonesian market for U.S. pork producers. Indonesia has agreed to eliminate approximately 99 percent of tariff barriers for most U.S. products, although public statements from Indonesian officials seemed to indicate that pork may not be included. Indonesia has also agreed to exempt U.S. food and agricultural products from all import licensing regimes and to recognize U.S. regulatory approaches (by accepting the FSIS 9060-5 certificate), and to impose no additional product or facility registration requirements. NPPC strongly encourages USTR to ensure that Indonesia implements the ART commitments.

Jamaica

Jamaica has maintained an unscientific ban on non-hermetically sealed U.S. pork for over 30 years, restricting imports almost exclusively to canned ham. Jamaica enforces this prohibition despite granting full fresh and frozen pork market access to competing suppliers like Canada, the EU, and the UK, which operate under identical commercial swine health statuses. NPPC strongly supports a science-based approach to trade and the opportunity to compete on a level playing field with countries that have the same commercial swine herd health status. A broadening of access for U.S. products to include fresh and frozen pork would make Jamaica a more significant potential market.

Kenya

Kenya represents a promising niche market for pork offal (hearts and livers), but maintains import procedures that restrict U.S. market access. Effective in 2026, the Kenya Bureau of Standards (KEBS) also mandates physical port inspections carrying a 0.6% customs valuation fee, creating port congestion at Mombasa. Director of Veterinary Services (DVS) import permits are frequently delayed based on local supply, and Kenya enforces unscientific ractopamine bans and trichinae freezing rules. NPPC encourages USTR to press for unrestricted full market access without any mitigations for pork exports to Kenya.

Korea

Korea eliminated its policy of recognizing veterinary drug residues for the same tissue of a similar species and no longer accepts Codex Alimentarius maximum residue Levels (MRLs) for veterinary drugs. Beginning January 1, 2024, Korea' Ministry of Food and Drug Safety (MFDS) implemented its new Positive List System, referencing only domestic MRLs or import tolerances (IT) for veterinary drugs in beef, pork, chicken, eggs, milk, and fishery products. In the absence of a Korean MRL or IT, antimicrobial products will be subject to a 0.01 ppm residue tolerance, or what is commonly known as "technical zero". For growth supplements and steroid type anti-inflammatory drugs, a standard of "non-detection" applies. Industry can submit applications for IT or higher MRLs for veterinary drugs through the MFDS Public Portal Service. Exports to Korea declined 6% in 2025 to $867 million. USTR must encourage MFDS processes IT applications efficiently to prevent trade disruptions.

Mexico

Mexico is the U.S. pork industry's top market at $2.85 billion (1.24 million mt) in 2025, taking 44% of all U.S. hams and shoulders). Securing a 16-year extension of the USMCA is critical to U.S. pork producers who rely on Mexico has a strong stable market for the majority of exports. On December 15, 2025, Mexico initiated an Antidumping and Countervailing Duty (AD/CVD) investigation against U.S. hams and shoulders following U.S. termination of the Tomato Suspension Agreement. NPPC urges USTR to prevent U.S. pork from being targeted in response to the termination of the Tomato Suspension Agreement and seasonal disputes for imported fruits and vegetables from Mexico.

New Zealand

U.S. pork imports are limited in New Zealand because of unfounded and unscientific concerns about disease transmission, such as PRRS. However, the WOAH chapter on PRRS states that the disease is not transmissible through legal trade in pork products, and all products should be allowed without restrictions. Currently, pork can only be imported if it is cooked, cured, canned, in consumer-ready packages of less than 3 kg, or destined for further processing. U.S. exports of cooked, cured, or canned pork to New Zealand totaled just over $47 million in 2024 and again in 2025. NPPC is seeking elimination of non-science-based restrictions on imports of U.S. pork and pork products into New Zealand.

Nigeria

While Nigeria began allowing pork sausage imports from the U.S. in early 2022, it has maintained an express prohibition against the importation of raw pork (all swine-related tariff lines under Harmonized Tariff Schedule (HTS) 0203, 0206, and 0210.10), as well as other meats and associated products. Nigeria's restrictions against U.S. pork products are non-science based, likely violate General Agreement on Tariffs and Trade (GATT) Article XI.1, and must be eliminated. NPPC encourages USTR to press for unrestricted full market access without any mitigations for U.S. pork exports to Nigeria.

Panama

Despite being a TPA partner, Panama has required facility registration for establishments that store, display, distribute, or sell meat and meat products under Ministry of Health Decree 255 which has resulted in major delays in the registration of U.S. pork facilities. On January 10, 2024, the Panam's Cabinet issued a decree to protect domestic pork producers from the economic effects of imports which effectively places a limit on how much U.S. pork can enter Panama under over-quota tariff conditions.

The decree caps total annual pork imports at just under 8,800 metric tons, with a 6% annual growth rate, covering chilled/frozen pork cuts and many processed products but excluding variety meats and bacon. The original cap has been modified through a series of Cabinet decrees — notably Decrees No. 18 (April 2025) and No. 24 (June 2025) and further amended by Decree No. 4 of 19 May 2026. The original 8,062 metric tons is increased by 3,000 metric tons (including 1,500 tons of finished "picnic ham" and 1,500 tons of raw pork cuts such as legs and paletas). The measure, however, requires non-automatic import licenses for any over-quota limit, which can be denied and prohibits the United States from taking advantage of the January 1, 2026, over-quota rate of zero under the U.S. Panama TPA. Panama also failed to notify the decree to the WTO. U.S. 2025 exports to Panama fell 16% in value to $60.0 million, and 18% in quantity to 17,697 mt. NPPC supports the original agreement, compliance with its terms, and full implementation of negotiated commitments on both sides.

Philippines

Despite temporary reduced pork tariffs of 15% in-quota and 25% out-of-quota through 2028, U.S. exporters face growing barriers from restrictive quota administration, a safeguards investigation, and proposed tariff increases.

Executive Order (EO) 116, issued in June 2026, increased the minimum access volume (MAV) from 54,210 MT to 204,210 MT. However, allocations reserving 120,000 MT for the Food Terminal Inc. (FTI) or Kadiwa program and 30,000 MT for processors raise concerns about private-sector access and quota utilization. Additionally, The Philippine government is pursuing a safeguards investigation amid falling farmgate prices and pressure from domestic hog producers, alongside efforts to raise pork tariffs. The Department of Agriculture has also petitioned to reclassify frozen pork jowls from edible offal to swine meat, potentially increasing tariffs from 5% to 10% in-quota and up to 25% out-of-quota.

U.S. pork exports fell from $213 million in 2021 to $114 million in 2023, recovering to $133 million in 2025. Meanwhile, Brazil became the Philippines' largest pork supplier in 2024, benefiting from competitive prices and expanded market access. Philippine imports are expected to reach record levels in 2026, heightening the stakes for U.S. competitiveness.

NPPC urges USTR to oppose unjustified safeguards and tariff increases; secure lower tariffs, a permanent MAV increase, and transparent quota allocation; challenge pork-jowl reclassification inconsistent with international standards; and negotiate an African swine fever (ASF) regionalization agreement with the Philippines, as well as finalize an Agreement on Reciprocal Trade with the Philippines.

Russia

Russia has doubled its production of pork since 2010 and shifted from being a major pork importer to a net exporter. It has maintained a ban on pork imports from the United States since 2014. These are political restrictions unrelated to any health or safety concerns and run counter to WTO rules and commitments.

Singapore

While the Singapore market is technically open to U.S. pork exports, there are several SPS issues that cause problems in the market. These include application of the 2022 regulations on pathogen reduction treatments, trichinae mitigation requirements, and non-scientific shelf-life requirements. NPPC supports

eliminating obstacles to trade that are not based on sound science to enhance U.S. access to the Singapore market. USTR assistance in addressing Singapore's non-tariff barriers to U.S. exports would help pork producers in this market where pork exports have totaled a paltry $10 million for the last three years.

South Africa

South Africa maintains a partial ban on U.S. pork. Under the Meat Safety Act 2000, DALRRD mandates that U.S. shoulder cuts undergo visible lymph node removal due to PRRS concerns, despite WOAH Chapter 15.3 establishing that commercial frozen pork does not transmit PRRS. South Africa also bans pork offal, heat-treated products, and casings, enforces 30% import duties, and mandates trichinae freezing rules and Salmonella zero-tolerance under its 2021 Microbiological Guidelines. These restrictions do not recognize animal health controls in the United States, including disease status, and are not compliant with international standards. NPPC wants full market unrestricted access for U.S. pork, including offal, heat-treated products, and casings for export to South Africa. While Sout Africa could be a growing market for U.S. pork producers, U.S. exports totaled only $306,000 in 2025. NPPC encourages USTR to consider these trade restrictions as it undertakes approval of new African Growth Opportunity Act (AGOA) commitment extensions.

Taiwan

In February of 2026, the United States and Taiwan, under the auspices of the American Institute in Taiwan ("AIT") and the Taipei Economic and Cultural Representative Office in the United States ("TECRO"), reached an ART. NPPC is supportive of the ART and appreciates the agreement on ractopamine MRLs for edible swine offal and for testing and compliance based on the exporting country's record of compliance. NPPC, however, remains concerned about the effects of the 2021 country-of-origin labeling (COOL) requirements for pork that were introduced to coincide with new MRLs for ractopamine use in pork production, with resulting negative impacts on U.S. pork exports. While the ART requires any testing for ractopamine MRLs or COOL to be based on the exporting country's record of compliance, the damage to U.S. exports in 2025, for example, was largely the result of a media disinformation campaign not the batch-by-batch testing imposed by government authorities. U.S. exports are up about 11% to Taiwan in the first half of 2026, but NPPC believes the full implementation of the ART agreement is critical to long-term market access and stability in order to ensure Taiwan honors its commitments with regard to testing and inspection.

Thailand

Thailand maintains a *de facto* ban on U.S. pork uncooked (fresh, frozen, chilled) pork and pork offal imports. It also has not established MRLs for ractopamine, though an MRL has been adopted by Codex since 2012 Under the October 26, 2025 Bilateral Framework, Thailand agreed to eliminate 30% MFN tariffs on U.S. agricultural goods and accept standardized FSIS health certificates. However, Thailand has indicated that pork may not be subject to the tariff elimination, and the Swine Raisers Association of Thailand is actively lobbying for import volume caps (1% to 10% of domestic consumption). NPPC supports the tariff and non-tariff barrier commitments negotiated by the Trump Administration, and supports finalization of the agreement and full implementation on both sides, which would benefit U.S. pork exports to Thailand.

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Vietnam

In 2020, Vietnam reduced its Most Favored Nation tariff rates from 15 percent to 10 percent for frozen pork product imports. NPPC is pleased with this reduction, but the tariff rate remains higher than the rates for competitors like the European Union, Russia, and Canada – which have trade agreements with Vietnam. While its market is technically open to U.S. pork, Vietnam continues to place restrictions on the import of "white offal," which includes products like intestines, spleens, and tongues, through a combination of quarantine requirements, port restrictions, and certification requirements that limit U.S. pork producers' ability to capitalize on Vietnam's need for pork variety meat. Additionally, onerous facility registration requirements, including requests for sensitive business information, are an unnecessary burden on exporters.

NPPC notes that Vietnam is in the process to making changes to amend it Food Safety Law and has drafted a Circular to consolidate and update terrestrial and aquatic animal quarantine inspection regulations, both of which were WTO notified. NPPC encourages USTR to press Vietnam to continue providing transparency on the development of these regulatory changes to ensure alignment with science-based and international food safety standards.

On July 2, 2025, President Trump announced that the U.S. and Vietnam reached agreement on a trade deal, however, details of the agreement for U.S. market access into Vietnam are still unclear and yet to be finalized. A trade agreement with Vietnam remains a top priority for U.S. pork producers, especially as the country battles ASF and needs safe, reliable, and affordable sources of pork.

In closing, NPPC appreciates the opportunity to comment on countries and issues for the NTE 2027 Report and looks forward to continuing to work with USTR and other U.S. government agencies to open and maintain market access for U.S. pork and pork products.

Thank you for your consideration.



Maria C. Zieba
Vice President of Government Affairs